

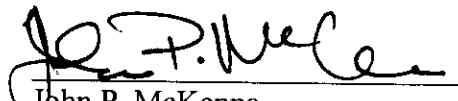
**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Sitcha Richard,)
(A95 461 653))
V.) Case No. 04-CV-300090-MAP
Frederick MacDonald, High)
Sheriff, Franklin County)
House of Corrections; Tom)
Ridge, Secretary, Department)
of Homeland Security; Michael)
Garcia, Assistant Secretary)
(Designee), Bureau of Immigration)
and Customs Enforcement (ICE);)
Eduardo Aguire, Acting Director,)
Bureau of Citizenship and)
Immigration Services("CIS");)
Bruce Chadbourne, Interim Director,)
ICE, Boston, Respondents)

**MOTION TO SUBMIT SUPPLEMENTAL AFFIDAVIT
AND OTHER SUPPORTING MATERIAL**

I, John P. McKenna, as Counsel for the Petitioner, Sitcha Richard, respectfully request the Court accept the submission of the Supplemental Affidavit of Sitcha Richard. This affidavit would supplement the affidavit filed by Sitcha Richard filed on November 10, 2004. This Supplemental Affidavit is based upon newly discovered evidence that Counsel just became aware of on November 16, 2004 and subsequently investigated. In addition, Counsel respectfully requests permission to submit additional documentation to support paragraph 3 of Sitcha Richard Affidavit filed on November 10, 2004. All material is attached.

Signed under the pains and penalties of perjury this 22th day of November 2004.



John P. McKenna

1537 Main Street, Suite 305

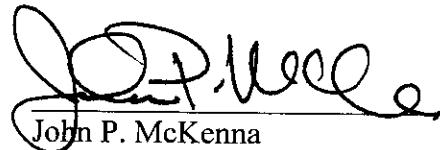
Springfield, MA 01103

(413)787-9995

Certificate of Service

I hereby certify that I served a copy of the foregoing motion, by hand delivery,
this 22th day of November 2004 on:

Assistant United States Attorney
Karen Goodwin
U.S. Attorney's Office
1550 Main Street, Room 310
Springfield, MA 01103



John P. McKenna